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9 Attorney for Defendant **LIZBETH PINEDA**

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,) Case No. 2:12-cr-232-LDG-PAL
Plaintiff,) MOTION TO MODIFY CONDITIONS
vs.) OF RELEASE AND PROPOSED ORDER
LIZBETH PINEDA,) THEREON
Defendant.) (Expedited Treatment Requested)

Comes now, the defendant, LIZBETH PINEDA, by and through her counsel of record, Victor Manuel Torres, and files his Motion to Modify Conditions of Release to allow Ms. Pineda to travel to Lafayette, Indiana to visit her cousin beginning February 9, 2013, until February 23, 2013; Ms. Pineda will then travel to Clearwater, Florida to visit friends of her family and returning to Las Vegas on March 9, 2013.

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The date currently set for her sentencing is March 5, 2013, but defense counsel is seeking to continue the hearing until March 19, 2013. This request is based upon the following points and authorities.

DATED: February 7, 2013

Respectfully submitted,

s/ *Victor Manuel Torres*
VICTOR MANUEL TORRES
Attorney for Ms. PINEDA

POINTS AND AUTHORITIES

The defendant, Lizbeth Pineda, initially appeared before the Court on June 11, 2012. Ms. Pineda was released from custody on her own recognizance with a condition, among others, that she not travel outside the District of Nevada.

Ms. Pineda spoke to her supervising U.S. Pretrial Services Officer Allison McCurry about travelling to visit her relatives and friends in Indiana and Florida. Ms. Pineda will be visiting Manuel Sanchez, who lives at 3211 Kingsmill Court, Lafayette, IN 47909 and his telephone number is (803)743-5473. She will then visit Diana Camarillo, who lives at 1280 Lakeview Road, Lot 123, Clearwater, FL 33756 and her telephone number is (727)709-0784.

Ms. McCurry has indicated to counsel that she is not opposed to this request. Ms. Pineda has maintained an excellent record of compliance with Pretrial Services and responsive to counsel and U.S. Probation at all times.

1 An exchange of e-mails between defense counsel Assistant U.S. Attorney
2 Andrew Duncan concerning this request indicated Mr. Duncan does not oppose this
3 request either.

4 **CONCLUSION**

5 For the foregoing reasons, the undersigned respectfully requests that this Court
6 allow Ms. Pineda to travel to Indiana and Florida for the purpose of visiting family and
7 friends before she is sentenced.

8 DATE: February 7, 2013

9 Respectfully submitted,

10 */s/ Victor Manuel Torres*

11 VICTOR MANUEL TORRES
12 Attorney for Ms. Pineda

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

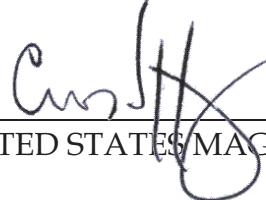
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UNITED STATES OF AMERICA,) Case No. 2:12-cr-0232-LDG-PAL
Plaintiff,) ORDER TO MODIFY CONDITIONS OF
vs.) PRETRIAL RELEASE
LIZBETH PINEDA,)
Defendant.)

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The Court being advised in the defendant's motion of the reasons for the request
and for good cause thereon appearing,

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13 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Motion to
Modify Conditions of Pretrial Release to permit travel to Indiana and Florida from
February 9, 2013 through March 9, 2013 is GRANTED.

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16 DATED: February 13, 2013

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UNITED STATES MAGISTRATE JUDGE



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CERTIFICATE OF ELECTRONIC SERVICE

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The undersigned hereby certifies that I am over the age of eighteen and
competent to serve legal papers.

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That on February 7, 2013, I served an electronic copy of the foregoing MOTION
TO MODIFY CONDITIONS OF PRETRIAL RELEASE AND PROPOSED ORDER
THEREON (Expedited Treatment Requested) by electronic service (ECF) to the
following persons:

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DANIEL G. BOGDEN
United States Attorney
ANDREW DUNCAN
Assistant U.S. Attorney
333 Las Vegas Boulevard So., 5th Fl.
Las Vegas, NV 89101

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/s/ Victor Manuel Torres
VICTOR MANUEL TORRES